Docket No.: ACT-322

REMARKS

In an Office Action dated 21 September 2005, the Examiner objects to the drawings, specification and claims. The Examiner also rejects claims 1-7. In response to the Office Action, Applicants amend the specification, cancel claims 1-7, and add claims 17-22. Applicants also respectfully traverse the rejections. In light of the amendments, new claims and arguments sent forth below, Applicants respectfully request that this application be allowed.

Applicants respectfully request that the rejection of the drawings be held in abeyance as Applicant was unaware of the drawing objections as the objections where not cited in the body of the action. Instead a separate draftsman sheet at the end of the action. Applicants will file a supplemental amendment as soon as formal drawings are completed.

Applicants have amended the Abstract as requested. Therefore, Applicant respectfully requests that the objection to the abstract be removed.

Applicants have canceled claims 1-7 and replaced with claims 17-22 which more specifically point out the invention as claimed. No new matter is presented in these claims 17-22.

The Examiner rejects claim 1 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,285,212 issued to Kaptanoglu (K). To anticipate a claim under 35 U.S.C. § 102, a single source must contain all of the elements of the claim. *Lewmar Marine Inc. v. Barient, Inc.*, 827 F.2d 744, 747, 3 U.S.P.Q.2d 1766, 1768 (Fed. Cir.

1987), cert. denied, 484 U.S. 1007 (1988). Moreover, the single source must disclose all of the claimed elements "arranged as in the claim." *Structural Rubber Prods. Co. v. Park Rubber Co.*, 749 F.2d 707, 716, 223 U.S.P.Q. 1264, 1271 (Fed. Cir. 1984).

New claim 17 recites a first set of conductors that connects the output ports of a first plurality of interface groups of a first tile with input ports of a second plurality of int. The freeway routing system comprises vertical and horizontal conductors connected by programmable elements arranged in a diagonal. K does not teach this limitation. K teaches an expressway routing system for connecting B1 blocks in adjacent B16XB16 tiles. B1 blocks include four clusters of logic elements. See Col. 9, lines 29-44. All the connections taught in K relate to the expressway connecting individual functional groups in the tiles to one another and not the different arrays as recited in claim 1. Thus, K does not teach anything relating to connection of different tiles in a FPGA. In fact the only discussion of connections of tiles in K is given in at Col. 2, lines 27-37 and Col. 4, lines 31-62. This discussion only mentions the existence of such connections and does not actually teach these connections. In these sections, there is no mention of conductors and programmable elements of the routing system as recited in claim 1. Thus, K does not teach the set of first conductors as recited in the claim 17. Thus, Applicants respectfully request that new claim 17 be allowed.

Claims 18-22 are dependent upon claim 17. Thus, claims 18-22 are allowable as being dependent upon an allowable independent claim. Therefore, Applicants respectfully request that claims 18-22 be allowed.

Docket No.: ACT-322

Applicants also respectfully request that the Examiner remove all rejections as being to cancelled claims 1-7.

If the Examiner has any questions regarding this response or the application in general, the Examiner is invited to telephone the undersigned at 775-586-9500.

Respectfully submitted,

SIERRA PATENT GROUP, LTD.

Dated: January 23, 2006

Reg. No.: 43,265

Sierra Patent Group, Ltd. 1657 Hwy. 395, Suite 202 Minden, NV 89423 (775) 586-9500 (775) 586-9550 Fax

9